

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
EASTERN DIVISION**

JULIAN B. RICHMOND,)	
)	
Plaintiff,)	
)	
VS.)	No. 4549
)	
STATE FARM FIRE AND)	
CASUALTY COMPANY,)	
)	
Defendant.)	

NOTICE OF REMOVAL

Defendant, State Farm Fire and Casualty Company, hereby notifies the Judges of the United States District Court for the Western District of Tennessee, the clerk of the Circuit Court of Hardin County, Tennessee and Plaintiff, Julian B. Richmond, that the action described herein and filed in the Circuit Court of Hardin County, Tennessee, is removed to the United States District Court for the Western District of Tennessee, Eastern Division pursuant to 28 U.S.C. § 1441.

1. On October 9, 2012, Plaintiff, Julian B. Richmond, filed a civil action bearing Docket No. 4549, against the Defendant, State Farm Fire and Casualty Company, in the Circuit Court of Hardin County, Tennessee. Service of the complaint and summons was made upon the Corporation Service Company for the Defendant on October 19, 2012, by certified mail through the Department of Insurance of the State of Tennessee.

2. This action is filed by Plaintiff for proceeds allegedly due under a contract of insurance written by Defendant, State Farm Fire and Casualty Company, insuring

Plaintiff's home and contents in Hardin County, Tennessee, which property was allegedly destroyed by a fire occurring on or about October 12, 2011.

3. Petitioner seeks removal of this action to this Court upon the grounds that the controversy is wholly between citizens of different states and involves an amount in controversy which exceeds Seventy-five Thousand Dollars (\$75,000.00), exclusive of the interest and costs, 28 U.S.C. § 1332. Specifically, the complaint alleges that the building and contents were destroyed by fire and seeks judgment against the defendant in the amount of \$100,000.00.

4. Plaintiff is a resident and citizen of the State of Tennessee and was a citizen of the State of Tennessee at the time of the filing of this action and at the time of removal. Defendant, State Farm Fire and Casualty Company, is a corporation incorporated in Illinois, with its principal place of business in Bloomington, Illinois. The amount in controversy exceeds Seventy-Five Thousand Dollars (\$75,000.00), exclusive of interest and costs.

5. This notice is filed within the time prescribed by 28 U.S.C. §1446(b).

6. A copy of the Summons and Complaint, being all the papers served upon the Defendant, is attached hereto.

WHEREFORE, Notice is hereby given that the said civil action number 4549 is removed from the Circuit Court of Hardin County, Tennessee, to this Court.

Respectfully submitted,

RAINEY, KIZER, REVIERE & BELL, P.L.C.

s/Russell E. Reviere
Russell E. Reviere (07166)
Attorney for Defendant
209 East Main Street
P. O. Box 1147
Jackson, TN 38302-1147
(731) 423-2414

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was forwarded first class U.S. Mail, postage prepaid to Chadwick G. Hunt, 450 A-Main Street, P.O. Box 1772, Savannah, TN 38372, and Terry Wood, Attorney at Law 236 N. Maple Street, Adamsville, TN 38310, counselor of record for Plaintiff, and by electronic means via the Court's electronic filing system.

This the 6th day of November, 2012.

s/ Russell E. Reviere